

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOE 1, JANE DOE 2, JOHN DOE 1, AND
JOHN DOE 2,

Plaintiffs,

V.

COLLINS MURPHY, LIMESTONE)
UNIVERSITY, BRENDA F. WATKINS, SHARON)
HAMMONDS, MG FREESITES, LTD. d/b/a)
PORNHUB.COM,)

Defendants.

Case No: 7:22-cv-03576-DCC

**PLAINTIFFS' NOTICE OF SETTLEMENT, AND
REQUEST FOR 60 DAYS TO FINALIZE SAME**

Plaintiffs and Defendants Limestone University, Brenda F. Watkins, and Sharon Hammonds have reached a settlement of the Plaintiffs' claims in this action against these Defendants.¹ These parties are in the process of exchanging for purposes of approving and executing the settlement documents.

Accordingly, Plaintiff would respectfully request pursuant to Rule 60, that this action is hereby dismissed without costs and without prejudice. If settlement is not consummated within sixty (60) days, either party reserves the right to petition the Court to reopen this action and restore it to the calendar. Rule 60(b)(6), Fed. R. Civ. P. In the alternative, to the extent permitted by law, the parties would request the right to within sixty (60) days of entry of an order of

¹ As per Docket Entry No. 94, Plaintiffs previously reached a settlement with Defendant MGFreesites, Ltd., d/b/a pornhub.com. The only remaining claims in the case would be against Defendant Collins Murphy.

dismissal without prejudice in this case to petition the Court to enforce their settlement. *Fairfax Countywide Citizens v. Fairfax County*, 571 F.2d 1299 (4th Cir. 1978).

The parties request the Court retain jurisdiction to enforce any settlement agreement reached between the parties. *Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375, 381- 82 (1994).

Respectfully Submitted,

WESLEY D. FEW, LLC

_____/s/Wesley D. Few/_____
Wesley D. Few, S.C. Bar No. 15565
P.O. Box 9398
Greenville, South Carolina 29604
864-527-5906 | wes@wesleyfew.com

H. COOPER ELLENBERG

Attorney at Law

H. Cooper Ellenberg1

1401 Doug Baker Blvd., Suite 107 492

Birmingham, Alabama 35242

(205) 908-1790 | cooper.ellenberg@gmail.com

OBY T. ROGERS, PLLC

Attorney at Law

Oby T. Rogers

Post Office Box 700

Collins, Mississippi 39428

(601) 765-1000 | ObyT1000@aol.com

ATTORNEYS FOR PLAINTIFFS JANE DOE 1,
JANE DOE 2, JOHN DOE 1 AND JOHN DOE 2

Greenville, South Carolina
April 20, 2024